

Allegheny County Health Department

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301 39th St.
Pittsburgh, PA 15201-1891

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Director

March 3, 1998

RECEIVED

Roger C. Westman, Ph.D.
Air Quality Manager

(412) 578-8103

Air Pollution FAX: (412) 578-8144

Thomas Goettge, Plant Manager
USS Clairton Works
USX Corporation
400 State Street
Clairton, PA 15025

RE: Settlement Offer; Statement of Violations No. 980202;
USS Clairton Works; July - September 1997

Dear Mr. Goettge:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USX), has been turned over to my office for appropriate enforcement action. Specifically this letter addresses the alleged violations, observed by County Inspectors and from USX reports, of various provisions of Articles XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Article XXI"), at your company's Clairton Works during the third quarter July 1, 1997, through September 30, 1997.

This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$4,400 by no later than 30 days from the date of this letter.

These alleged air pollution control violations at your Allegheny County Clairton Works, including Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20, and B, involve the following:

- Excessive visible emissions from the pushing of coke from Batteries 13, 15, 19, and 20, in violation of §2105.21.e.4 of Article XXI; and

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USX Corporation
SOV No. 980202
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- Excessive visible emissions from the transport of coke from Batteries 13, 15, and 20 in violation of §2105.21.e.5 of Article XXI.

Summaries of the alleged violations and the basis for this settlement offer are enclosed with this letter. If USX chooses to accept this offer, a civil penalty payment in the amount of \$4,400, by check payable to the "Allegheny County Clean Air Fund", must be received by this office, to my attention at the address above, by no later than the deadline indicated above. If such penalty payment is made in accordance with this offer, the County, by this letter, hereby agrees to accept such penalty in full satisfaction of all violations alleged herein, without any final determination of law or fact, and hereby agrees to not seek any further penalties or remedial actions for such alleged violations.

The County prefers to settle alleged violations such as these rather than initiating litigation. A failure to accept this settlement offer by the deadline stated, however, will result in formal enforcement action by the County, which could include the filing of summary criminal complaints before the designated district justice.

In addition, the settlement terms acceptable to the County will increase after such deadline since additional enforcement resources will be committed to this matter.

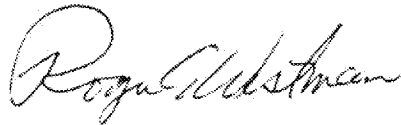
The amount of the civil penalty payment from your company which has been offered to settle these violations in the above-referenced areas is based on the nature, severity, and frequency of the alleged violations, on the potential summary criminal penalties, upon conviction, of \$100 to \$2,500 per violation per day, and on the potential civil penalties of up to \$25,000 per violation per day. Also considered are such things as the health effects of the pollutants involved, the apparent willful or

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inadvertent nature of the violations, any potential impacts on the public, any actions taken, or being taken by your company (that have been reported to the County) to minimize the violations or to prevent future violations, the level of success of such actions, and the compliance history of the source.

Thank you for your anticipated prompt attention to this matter.

Very truly yours,



Roger C. Westman, Ph.D.
Air Quality Manager

encl.

cc: Bruce W. Dixon, M.D.	(w/ encl.)
Stephen K. Todd	(" ")
USX Corp.	
Richard Dworek	(" ")
USX Corp.	
H. R. McCollum	(" ")
USX Corp.	
Joseph Pezze	(" ")
PA DEP, Pgh.	
Judith Katz	(" ")
US EPA Reg. III, Phil.	
Sandra L. Etzel	(" ")
William U. Clark	(" ")
Henry Miller III	(w/o encl.)

ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM
USX CORPORATION - USS CLAIRTON WORKS
Coke Plant Performance Data

3rd Quarter (July, August, September) 1997

SUMMARY

<u>Source</u>	<u>Violations</u>					<u>Civil Penalty Settlement Offer</u>
	<u>(except as noted)</u>	<u>non-de minimis</u>				
Visible Emissions						
Charging	0	0				
Door Areas	0	0				
Charging Ports	0	0				
Offtake Piping	0	0				
Pushing						
with control device 20% Opacity Std.	6	6	x	\$450.00	= \$2,700.00	
transport w/o control 10% Opacity Std.	4	4	x	\$425.00	= \$1,700.00	
Combustion Stacks						
20% Opacity Std.	0	0				
60% Opacity Std.	0	0				
Pushing Control Unavail. (1.58%)	1 (a.)	0				
Coke Oven Gas Desulfurization						
Performance	0	0				
Unavailability (b)	8.33%					
Breakdown Reporting	0	0				
Flaring of Raw Coke Oven Gas	1 (c,d)	0				
Venting of Raw Coke Oven Gas	0 (c,d)	0				
Monthly & Monitoring Reports (timeliness, completeness, etc.)	0	0				
Total	12+	10				\$4,400.00

- (a) Based on individual battery unit monthly performance.
(b) Unavailability of part of the desulfurization unit may not cause an exceedance of the standard; desulfurization was in compliance 100% of the time (92 of 92 days) during the third quarter 1997.
(c) Number of battery 15-minute periods, or part thereof.
(d) Flaring: 3 battery-minutes; venting (unflared): 0 battery-minutes.

ALLEGHENY COUNTY HEALTH DEPARTMENT
 AIR QUALITY PROGRAM
 USX CORPORATION - USS CLAIRTON WORKS
 Coke Plant Performance Data

3rd Quarter (July, August, September) 1997

<u>SOURCE</u>	<u>BATTERY</u>	<u>DATE</u>	<u>OBSERVATIONS</u>
<u>Visible Emissions</u>			
Charging		NO VIOLATIONS	
Door Areas		NO VIOLATIONS	
Charging Ports		NO VIOLATIONS	
Offtake Piping		NO VIOLATIONS	
Pushing			
w/control device	15	07/22	17 secs. $\geq 20\%$ (75% max.)
20% standard	20	07/30	16
	19	08/11	20
	20	08/11	30
	13	09/08	28
	20	09/22	15
			75
transport in	15	07/22	9 secs. $> 10\%$ (40% max.)
open atmosphere	20	07/30	5
10% standard	20	08/11	52
	13	09/08	16
			40
Combustion Stacks			
20% standard		NO VIOLATIONS	
60% standard		NO VIOLATIONS	

ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM
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Coke Plant Performance Data

3rd Quarter (July, August, September) 1997

Pushing Control System Unavailability

<u>Battery No.</u>	<u>Uncontrolled Pushes</u>	
	<u>Month/Year</u>	<u>%</u>
1,2,3	07/97	0.00
	08/97	1.35
	09/97	0.82
7,8,9	07/97	0.73
	08/97	1.26
	09/97	1.33
13,14,15	07/97	4.67
	08/97	0.68
	09/97	1.67
19 & 20	07/97	6.12
	08/97	0.64
	09/97	2.07
B	07/97	0.00
	08/97	0.00
	09/97	0.00

Total Pushes (12 Batteries): 96,258

Coke Oven Gas Desulfurization

	<u>Bat. No.</u>	<u>Date</u>
Performance	all	NO VIOLATIONS
Unavailability	all	09/23-30

Total: 8 24-hr period(s), or
part thereof, w/o full use of
the desulfurization process.

Note: During the third quarter 1997, desulfurization was in compliance
100% of the time on a daily basis (92 of 92 days). Unavailability
of part of the desulfurization unit may not cause an exceedance of
the standard.

Delayed Breakdown Reporting

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ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM
USX CORPORATION - USS CLAIRTON WORKS
Coke Plant Performance Data

3rd Quarter (July, August, September) 1997

Venting/Flaring of Raw Coke Oven Gas

<u>Emission Incident (date)</u>	<u>Notes</u>	<u>Battery (No.)</u>	<u>Emission (start and end time)</u>	<u>Periods(a.) of Emission</u>	<u>Emission (vented or flared)</u>
07/14/97	—	07	0110:00-0113:00	1 (3 min.)	Flared

a. Number of battery-15-minute periods or part thereof, of
emission(s).

b. Incidents (flaring only) less than 2 minutes duration not reported in real
time, but summarized in Process Information Report submitted monthly to
ACHD-AQP by USS.

Monitoring/Monthly Reports

NO VIOLATION

ALLEGHENY COUNTY HEALTH DEPARTMENT
AIR QUALITY PROGRAM
Coke Plant Enforcement Data
USX CORPORATION - USS CLAIRTON WORKS

3rd Quarter (July, August, September) 1997

<u>SOURCE</u>	<u>TOTAL INSPECTIONS</u>	<u>VIOLATIONS</u>	<u>COMPLIANCE</u>
CHARGING	55	0	100%
DOOR AREAS	54	0	100
CHARGING PORTS	57	0	100
OFFTAKES	57	0	100
PUSHING			
Push \geq 20%	53	6	88.7
Travel > 10%	53	4	92.5
STACKS			
\geq 20%	94	0	100
\geq 60%	94	0	100

10/24/97